

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7414

FACILITY NAME: GOURMET CUISINE INC.

GENERAL INFORMATION	
Applicant	Betty A. Crouse, VP Finance
Facility Name and Address	Gourmet Cuisine Inc. 2825 Roeder Avenue, #4 Bellingham, WA 98225 Whatcom County
Type of Facility	Food Processing – Sauces and Gravies
Facility Discharge Location	Latitude: 45° 45' 49.9" N. Longitude: 122° 30' 46.1" W.
Treatment Plant Receiving Discharge	City of Bellingham, Post Point Water Treatment Facility WA-002374-4
Contact at Facility	Ms. Jeanne Laverdier, Microbiology Technician 360-676-9140
Responsible Officials	Ms. Betty A. Crouse, VP Finance Mr. Dirk Schulbach, Plant Manager 2825 Roeder Avenue Bellingham, WA 98225 Telephone #: 360-676-9140 FAX #: 360-715-1330

TABLE OF CONTENTS

INTRODUCTION	3
BACKGROUND INFORMATION	4
DESCRIPTION OF THE FACILITY	4
Industrial Processes.....	4
Solid Waste	5
Treatment Processes.....	5
PERMIT STATUS.....	5
SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT	5
WASTEWATER CHARACTERIZATION.....	5
PROPOSED PERMIT LIMITATIONS.....	6
TECHNOLOGY-BASED EFFLUENT LIMITATIONS	6
EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS.....	6
COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED MAY 18, 1999	6
MONITORING REQUIREMENTS.....	6
OTHER PERMIT CONDITIONS	7
REPORTING AND RECORDKEEPING	7
OPERATIONS AND MAINTENANCE.....	7
PROHIBITED DISCHARGES.....	7
DILUTION PROHIBITED	7
SOLID WASTE PLAN	7
SLUG DISCHARGE CONTROL PLAN	7
NONROUTINE AND UNANTICIPATED DISCHARGES.....	7
GENERAL CONDITIONS	8
PUBLIC NOTIFICATION OF NONCOMPLIANCE	8
RECOMMENDATION FOR PERMIT ISSUANCE	8
REFERENCES FOR TEXT AND APPENDICES.....	8
Appendices.....	9
APPENDIX A—PUBLIC INVOLVEMENT INFORMATION	9
APPENDIX B—GLOSSARY.....	10

INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7414. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the city of Bellingham's Post Point Pollution Control Facility. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before final issuance.

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Gourmet Cuisine Inc. is located within the Bellingham Cold Storage complex on the Squalicum Fill. They formulate, cook, cool, and freeze manufactured food sauces. The product is packaged for further processing.

There are no categorical pretreatment limitations listed in 40 CFR Part 408.184 (Subpart R) for this industry. They are categorized under standard industrial classification (SIC) code 2035, *Pickled Fruits and Vegetables, Vegetable Sauces and Seasonings, and Salad Dressings*. (SIC code 2099 refers to dry seasoning mixes only).

This facility is considered a significant industrial user based on biochemical oxygen demand (BOD₅) loadings to the city of Bellingham WWTP. For the year 2003, based on discharge monitoring report data, the average BOD₅ loadings from Gourmet Cuisine to the city of Bellingham WWTP were 563 pounds per day. The range was 161-2,197 pounds per day. The design capacity criteria for the Bellingham plant is 25,500 pounds per day. However, the actual average BOD₅ input to the plant is closer to 18,000-20,000 pounds per day, making the Gourmet Cuisine BOD₅ contribution around 2.5-3% of the daily loading.

INDUSTRIAL PROCESSES

Gourmet Cuisine manufactures and packages over 30 products including Alfredo, Béarnaise Cheese and Hollandaise sauces, gravies, and soups, frozen in 5-10 gram packets. There is little seasonal variation in operations. An extensive list of food grade raw materials was in the permit application including seasonings, flavorings, oils and butters, cream, flour, starch, tomato paste and puree, and sugars.

This facility typically operates 20 hours per day, 5 days a week.

Best management practices (BMPs) required or recommended for this facility to reduce loadings to the sanitary sewer are dry sweeping, use of floor screens, fine screening, and grease separation.

All water used is from the municipal supply. The average daily water usage is 25,000 gallons. Water is metered as it enters the building. Effluent is not metered. Some ongoing cleaning occurs during production for operational sanitation. Much of the water is used in the formulation of product so not all water entering the building leaves as wastewater. Water usage will be estimated by subtracting production and domestic usage from the incoming water meter flow values. If this method of wastewater flow estimation proves to be ineffective, a separate wastewater flow meter will have to be installed.

Most wastewater is generated from washing the bins and tubs used for batch weighing of ingredients and during the cleaning cycle at the end of the production day. All of the plant floor drains discharge to the southwest corner of the building for wastewater collection, solids screening, and grease separation.

This is an existing, permitted facility. This is a renewed permit. Gourmet Cuisine began operation at this facility in the spring of 1999.

SOLID WASTE

Production waste and raw material waste is disposed of with wet garbage. Packaging material waste is recycled with a dry waste hauler. Sanitary Service in Bellingham performs garbage and trash removal services.

TREATMENT PROCESSES

All process wastewater and washwater gravity flows through the floor drains and to a sump at the southwest corner of the building. The wastewater is pumped up and over the fine mesh tangential screen prior to entering the city of Bellingham sanitary sewer system.

PERMIT STATUS

The previous permit for this facility was issued on May 18, 1999, and had a daily maximum flow limit of 10,000 gallons per day (based on an estimate of what the new facility would discharge). The permit was modified on April 11, 2003, to reflect a daily maximum flow of 50,000 gallons because the facility routinely exceeded the 10,000-gallon per day estimate.

An application for permit renewal was submitted to the Department on March 22, 2004, and accepted by the Department on April 5, 2004.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received a compliance inspection on March 18, 2003.

During the history of the previous permit, the Permittee was issued a warning letter on April 7, 2003, for a 0.3 standard unit pH exceedance. The facility has also failed to routinely submit monthly discharge monitoring reports. Reports were submitted late for March and April 2000; July 2001; September 2001 through February 2002; December 2002; February and September 2003. Monthly DMR reports were never submitted for October and November 2003, and January and February 2004.

WASTEWATER CHARACTERIZATION

The wastewater discharge is characterized for the following parameters based on the submitted data for the years 2002 and 2003:

Parameter	Concentration or Volume	
	Range	Average
Flow, gpd	8,545 – 21,276	12,278 gpd
5-Day Biochemical Oxygen Demand (BOD ₅)	860 – 18,000 mg/L 161 – 2,197 lbs/day	4,695 mg/L
Total Suspended Solids (TSS)	89 – 5,450 mg/L	1,006 mg/L
Oil and Grease	28 – 1,500 mg/L	209 mg/L
pH, standard units	6.5 – 11.3	8.11

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

Gourmet Cuisine is not required, at this time, to provide advanced treatment for BOD₅ and TSS other than screening, because the Bellingham WWTP has the capacity to treat the waste.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). There are no pretreatment limitations listed in the existing federal categorical limitations for this type of facility. The following permit limitations are necessary to satisfy the requirement for AKART:

All process wastewater including clean-up water must go through grease separation and screening through a fine mesh screen prior to discharge to the Bellingham sanitary sewer system.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through, or hazardous exposure to POTW workers nor will it result in unacceptable pollutant levels in the POTW's sludge. There are no local limits for BOD₅, TSS, and oil and grease.

The flow limitations are based on the Permittee's application.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED MAY 18, 1999

Parameter	Existing Limits	Proposed Limits
Flow (gpd, daily max)	50,000	50,000
pH (standard units)	Between 6.0-11.0	Between 6.0-11.0

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110). The sampling location has been identified as after screening and grease separation located at the southwest corner of the building, and prior to discharge to the Bellingham sanitary sewer system.

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 173-216-110 and 40 CFR 403.12 (e), (g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains Condition S.5 as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances that cause pass-through or interference, pollutants that may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the solid waste plan designed to prevent solid waste from causing pollution of the waters of the state and submit it to the Department.

SLUG DISCHARGE CONTROL PLAN

The Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely effect the POTW, therefore, a slug discharge control plan is required [40 CFR 403.8 (f)].

NONROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate wastewater that is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. These typically are waters used to pressure test storage tanks or fire water systems or leaks from drinking water systems. These are typically clean waste waters but may be contaminated with pollutants. The permit contains an authorization for nonroutine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and opportunities for reuse, Ecology may authorize a direct discharge to the municipality, require the wastewater to be placed through the facilities wastewater treatment process, or require the water to be reused.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending, or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes, or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with pretreatment standards or requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a term of five (5) years.

REFERENCES FOR TEXT AND APPENDICES

Permit Application submitted March 22, 2004

Washington State Department of Ecology

Laws and Regulations (<http://www.ecy.wa.gov/laws-rules/index.html>)

Permit and Wastewater Related Information
(<http://www.ecy.wa.gov/programs/wq/wastewater/index.html>)

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page one of this fact sheet. The permit contains conditions and effluent limitations that are described in the rest of this fact sheet.

There are no substantial changes from the previous permit, therefore, the draft permit and fact sheet for the reissued permit will not be public noticed.

This permit and fact sheet were written by Lori LeVander.

APPENDIX B—GLOSSARY

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)—Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the state. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅—Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling—A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling—A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short a period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business; from the development of any natural resource; or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and
- Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including state regulations contained in any state sludge management plan prepared pursuant to Subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Pass-through—A discharge which exits the POTW into waters of the state in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of state water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User—A potential significant industrial user is defined as an industrial user which does not meet the criteria for a significant industrial user, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day; or
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass-through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

Gourmet Cuisine Inc.

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Significant Industrial User (SIU)—

- 1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; and
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of nondelegated POTW's or to the POTW in the case of delegated POTW's.

Slug Discharge—Any discharge of a nonroutine, episodic nature, including but not limited to an accidental spill or a noncustomary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.